

CARLSMITH BALL LLP

DAVID LEDGER (CNMI BAR NO. F0195)

Carlsmith Ball LLP Building

Capitol Hill

Post Office Box 5241

Saipan, MP 96950-5241

Tel No. 670.322.3455

Attorneys for Defendants

American Overseas Marine Corporation

and General Dynamics Corporation

IN THE UNITED STATES DISTRICT COURT

FOR THE

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

KENNETH COUTURE,

Plaintiff,

vs.

AMERICAN OVERSEAS MARINE  
CORPORATION and GENERAL  
DYNAMIC CORPORATION,

Defendants.

CIVIL ACTION NO. CV05-0024

**JOINT REQUEST BY THE PARTIES  
TO EXTEND DATE TO FILE  
PRETRIAL PLEADINGS AND  
OPPOSITIONS TO PENDING  
MOTIONS; DECLARATION OF  
SERVICE**

This action is currently set for Trial on April 9, 2007. Certain Pre-trial pleadings and Motion papers are due, as follows:

1. Joint Pre-trial Order, March 16, 2007.
2. Trial Brief, Exhibit List, Witness List, Proposed Voir Dire Questions, Proposed Jury Instructions and Proposed Verdict Form, March 26, 2007.
3. Defendants' Opposition to Plaintiff's Motion For Sanction, March 22, 2007.
4. Plaintiff's Opposition to Defendants Motion For Sanctions, (date for Opposition not yet set).


1 The parties continue to work toward a settlement of this action, and the Court has set a  
2 settlement conference for March 26, 2007. In light of this, the parties would like to delay (and if  
3 possible avoid altogether) the expense involved to prepare the pleadings listed above, so as to  
4 focus efforts on settlement and hopefully render preparation of the listed pleadings unnecessary.  
5 In addition, Counsel for Plaintiff Mr. Bruce Berline is presently ill and admitted to the hospital  
6 on Saipan and unable to work on the listed pleadings.  
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8 On March 19, 2006, I discussed the above issues and this joint request to extend dates to  
9 file pleadings with Plaintiff's Counsel William Fitzgerald, suggesting March 29, 2007 as the new  
10 date. Mr. Fitzgerald agrees with March 29, 2007 to file the above-listed pleadings, and  
11 authorized me to so state in this pleading.  
12

13 Therefore, for good cause shown, the parties jointly request that the Court allow the  
14 pleadings listed above to be filed on March 29, 2006.

15 SUBMITTED: March 19, 2007.

16 CARLSMITH BALL LLP

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18 DAVID LEDGER  
19 Attorneys for Defendant  
20 American Overseas Marine Corporation  
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**DECLARATION OF SERVICE**


The undersigned hereby declares that on the 19th day of March 2007, I will cause to be served, via electronic filing/service, a true and correct copy of the **JOINT REQUEST BY THE PARTIES TO EXTEND DATE TO FILE PRETRIAL PLEADINGS AND OPPOSITIONS TO PENDING MOTIONS; DECLARATION OF SERVICE** upon the following Counsels of record:

William M. Fitzgerald, Esq.  
Law Office of William M. Fitzgerald  
1st Floor, Macaranas Building  
Post Office Box 909  
Ph: 670-234-7241  
Facsimile: 670-234-7530  
Saipan, MP 96950

and

Bruce Berline, Esq.  
Law Office of Bruce Berline  
1st Floor, Macaranas Building  
Post Office Box 5682 CHRB  
Ph: 670- 233-3663  
Facsimile: 670-233-5262  
Garapan, Saipan MP 96950

DATED: March 19, 2007.

  
DAVID LEDGER